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ABSTRACT

This essay reviews the history of and reasons for the federal government's reluctance to enforce standards for day care quality. It is argued that the federal government must at least assure that the day care it subsidizes is not detrimental to children. Several revisions in the existing federal standards and the mechanisms for enforcing them are suggested. First, the Federal Interagency Day Care Requirements (FIDCR) should be made more explicit, operationally definable, enforceable, and economically realistic. Second, to assure accountability, fiscal and monitoring review responsibilities should be based in a federal agency specifically committed to children and families. Third, federal, state and local agencies involved with day care must have resources to facilitate improvement and limit abuses. Finally, standards should allow for pluralism in providing day care in various settings, for various age groups, and by various types of providers.
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FEDERAL DAY CARE STANDARDS:

RATIONALE AND RECOMMENDATIONS

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Executive Summary

The Federal government must have standards to ensure that the day care it subsidizes is not harmful to children. However, existing Federal standards should be revised to be more explicit, operationally definable, enforceable and economically realistic. Furthermore, to assure accountability, fiscal and monitoring review responsibilities should be based in a Federal agency specifically committed to children and families. Federal, state and local agencies involved with day care must have resources to facilitate improvement and limit abuses. Standards should allow for pluralism in providing day care in various settings, for various age groups, and by various types of providers.

Preface

The topic of day care standards is complex and can be approached from many perspectives. In determining standards, both empirical research and the values of a society must be considered. Yet, in the attempt to discern the implications of a particular research study or a particular piece of legislation for day care policy, this important value dimension is often obscured. In the following paper we have therefore chosen to highlight the need for weighing the values, frequently competing, that enter into the day care standards debate. While our conclusions are based in part on our reading of currently available literature, they also result from our experience as decisionmakers in an area where the knowledge base has been and remains inconclusive.

What quality day care is the Federal government buying? Over one million preschool children are in day care, and hundreds of thousands of children spend their most active hours, week in and week out, in Federally subsidized day care settings. The annual Federal bill for day care approaches $2 billion. Yet, despite its increasing involvement in funding day care, the Federal government has been reluctant to enforce standards for day care quality. This essay reviews the history and the reasons for that reluctance. We argue that, at the least, the Federal government must assure that the day care it subsidizes is not detrimental to children. And we suggest revisions in the existing Federal Interagency Day Care Requirements and the mechanisms for enforcing them.

History

Although day care has existed in America for over 100 years, the idea of government responsibility for day care quality is relatively recent. The first day care centers, or day nurseries, opened in the 1850's as informal rescue programs for the children of the poor.[1] These private charitable efforts were intended to be no more than temporary aids to families until the mother was able to stay home.[2,3] It is remarkable that, even with the advent of large numbers of working mothers and substantial public funding, this conception of day care as a social welfare tool has endured. Day care has remained suspect—at worst, family-undermining; at best, an inferior alternative to mothers staying at home. Thus, politicians rarely advocate day care simply for the sake of children; rather, they feel compelled to justify day care as a device to achieve some other social goals, such as freeing women to join the mobilization for war, or helping to reduce public welfare rolls.

To the extent that a sense of public responsibility has developed toward day care, it has more often taken the form of protecting children from all day care than from bad day care. In the early 1900's, when the number of immigrant children in day nurseries began to swell, charitable agencies established strict eligibility requirements for day care. Even the families who used day care usually looked forward to the time when the mother could return full time to the care of children. Similarly, although World War I increased the ranks of working women, the nation still saw day care as a temporary solution to an emergency situation. As soon as the war ended, Progressive reformers proposed Mother's pensions and other measures designed to enable mothers to stay at home. The working women never really did return home in the expected numbers, but the government continued its hands-off policy toward day care, as if any move to protect the quality would be viewed as an endorsement of mothers working.[2]

Even when the Depression and World War II vastly increased the Federal expenditure on day care, the government was careful to underline day care's temporary status. Federal administration was not vested in the Children's Bureau, the most likely champion of day care quality. Instead, during the Depression, when day care was advanced as a source of public employment, administration was placed in the Works Progress Administration (WPA).[4] Then, during World War II, when work became a patriotic as well as financial necessity for many mothers, the Children's Bureau was again relegated to the sidelines of Federally subsidized programs. Day care administration fell to the Office of Defense Health and Welfare Services.[5] The nearly 3,000 wartime day care facilities were virtually exempt from specific Federal and state child care regulation. As soon as

the war ended, the nation quickly disassembled the day care system, even though the large numbers of mothers in the work force and the need for day care continued.

Current Federal Stance

Despite the increasing Federal government involvement in day care in the last decade, the principle of Federal responsibility for day care quality has yet to be firmly established.[6] At least 12 different Federal agencies, ranging from the Department of Agriculture to the Small Business Administration, have invested in day care.[7,8] But, despite the existence of the Children's Bureau and the creation in 1969 of the Office of Child Development, no single Federal agency has been granted the economic power necessary to coordinate this maze of day care, much less enforce standards of quality. In a recent example, control of the largest Federally funded day care program, under Title XX of the Social Security Act, was not vested in the OCD but rather in the Community Services Administration of HEW. Although the Children's Bureau personnel in the Office of Child Development are theoretically charged with guaranteeing the quality of Title XX day care, OCD does not have the power to make such review meaningful. Once again the United States has repeated the mistake of previous day care efforts, placing control of day care in an agency not primarily committed to the welfare of children.

Just as Title XX day care finds its administrative home in an agency not specifically devoted to children, so too its primary political justification is to reduce welfare rolls, not to help children. Yet, there is no convincing evidence that day care helps welfare parents become working parents. And, even if it did, is it wise economic policy for the Federal

government to buy day care for more than one or two children in a poverty-level family in order to move a mother into the workforce at near poverty wages?[9] Shrinking job markets make this strategy of using day care as a tool of welfare reform still less likely to succeed.

Questions of day care strategy and fiscal control are closely related to day care standards. If the commitment to day care is based on some other social goal than the welfare of children, and if the fiscal power is distributed accordingly, the quality of the programs may suffer. Compare, for example, the differences between Title XX day care and the day care component of the Head Start program, which is under the fiscal as well as theoretical jurisdiction of OCD. Although both day care programs serve children of the economically disadvantaged, the two groups of children are often treated quite differently. Head Start has from its inception been viewed as a quality program to benefit children; it represents an oasis of concern about children in many communities. Head Start's education and health components are specifically designed to meet the needs of the children it serves. In addition, Head Start has served as a national model of developmental programming for children.[10,11]

By contrast, the quality of Title XX day care varies considerably. Title XX day care was originally supposed to comply with the 1968 Federal Interagency Day Care Requirements (FIDCR), which we will discuss later. But the states legitimately feared that the Federal government would not provide the money necessary to comply. As a 1973 HEW audit revealed, the states would have a lot of catching up to do: 4/5 of the 552 facilities sampled did not meet Federal requirements even in basic health and safety areas.[12] In view of this problem, Congress placed a moratorium on Title XX compliance with the FIDCR. As of this writing, while in some states Title

XX day care does conform to FIDCR standards, Federal law requires only that day care facilities follow state licensing laws, which vary considerably.

Rationale for Federal Standards

Federal day care regulation is needed in addition to state day care licensing laws for several critical reasons. Licensing laws vary from state to state and even between localities in a single state. In many instances, they have become so intricate that they primarily constitute a barrier to creating new day care facilities which are clearly needed. Furthermore, day care licensing laws typically concern themselves with the physical safety of children, e.g., does the center have enough protection against fire, and are the caregivers free of communicable diseases. Other crucial criteria of day care quality, such as the child-staff ratio and the competency of the caregivers, tend to be neglected or far too lenient.

Some states are, of course, just as enlightened about day care standards as are day care personnel at the Federal level. Other states are in the process of revising and/or upgrading their standards. But if a state is willing to have 10 toddlers cared for by a single caregiver, the Federal government should not endorse such practices much less help pay for the services delivered in this way. Standards can probably more effectively be monitored at the state than at the Federal level but the issue is not a constitutional one, dealing with the proper division between state and Federal prerogatives. Rather, the issue is what kind of lives children will experience in day care settings during their formative years.[13]

Even if a nation commits itself to the need for day care standards, however, there remains the pragmatic problem of determining just what those standards should be. Clearly, there is a paucity of experimentally-

controlled, rigorous data to guide social policy concerning children. But it is the responsibility of policymakers to navigate the most reasonable course of action based on the considerable evidence and experience to date. In charting their course, their overriding concern should be the medical dictum, "First of all, do no harm." In the absence of "hard" evidence, we must endorse the program least likely to be detrimental to children and families.

In the day care quality debate, which reached a peak in the early 1970's, "custodial" and "comprehensive" have been rallying cries. The cost-effectiveness stalwarts were said to favor limited, custodial day care, satisfying only the most basic psychological and physical needs, while the quality-at-any-price advocates, who thought all children should have a broad array of health, educational, psychological, and social services—including parent involvement—were said to favor comprehensive day care. These extreme positions left a large middle ground which some, including the authors, attempted to fill by advocating "developmental" day care. This meant providing the services necessary to guarantee the healthy social, emotional, intellectual, and physical development of the child. In the end, however, all of these terms may have contributed more to semantic confusion than to the elucidation of day care quality. Wisely, these terms were largely ignored by parents, who were simply looking for a caregiver and a day care setting in which their children would be at least moderately content and happy.[14]

Misleading rhetoric has also plagued discussion of the 1968 Federal Interagency Day Care Requirements, often cited as the manifesto of quality day care. Since they are supposed to govern all Federally supported day care and are written into several major bills, these requirements deserve far closer analysis than they usually receive.

Federal Interagency Day Care Requirements

To the FIDCR drafters' great credit, these standards set a precedent for care that is developmentally oriented. Based largely on experience with Head Start, the best available program of the time, the FIDCR covered a broad range of issues important in the delivery of quality child care. Yet, the FIDCR contain many problems, even for day care advocates. First, they were deliberately unspecific, more guidelines than clearly defined standards, and this lack of specificity has made them difficult to enforce. In fact, the FIDCR have received the same treatment as the goal-setting statements issued by the old Children's Bureau: Enforcement has never even been attempted. Second, the 1968 FIDCR were primarily concerned with center-based day care, which serves only a small proportion of the children in day care. Third, the FIDCR did not clearly define the responsibilities of the day care provider and the various administering agencies, and they were vague on the requirements for caregivers. Finally, the 1968 FIDCR were not sufficiently age-specific; that is, they did not provide for the special day care needs of infants and toddlers, as contrasted with those of preschool and school-age children.

Interestingly, despite these obvious deficiencies, the 1968 FIDCR ratio of one caregiver for each five children ages three to four years has attained near-sacred status. No figure recurs more frequently in Congressional testimony as the hallmark of quality child care. And yet, this ratio, sound enough for the preschool-age children in the Head Start program from which it was probably derived, would make no sense at all for infants: It is doubtful whether one caregiver could carry five infants to physical safety, in the event of a fire or disaster, much less provide them with adequate daily attention. As for school-age children, a 1:5 ratio may be unnecessarily

protective. Those close to day care have long recognized the deficiencies of the high-minded 1968 standards. However, there has been an unwillingness to challenge them for fear that nothing better would be substituted and that the outcome would be far worse.

1972 FIDCR proposals. In 1970, while serving in the Office of Child Development, we began an attempt to revise and strengthen the 1968 FIDCR as a foundation for the day care component of the Welfare Reform Plan. (The implicit assumption was that, even if the reform plan did not go through, new day care regulations were needed for the Federal day care program already being funded through the Social Security Act.) This revision process began at the Airlie House Conference of 1970, at which a cross section of one thousand individuals concerned with day care, including providers, parents of children in day care, and professionals, met together. They developed a statement of principles concerning day care, as well as the basis for a series of manuals with guidelines for infant care, preschool day care, and school-age day care.[15-18] Following the Airlie House Conference, OCD worked for two years to develop a final set of day care standards. Cost analyses were assessed; the day care state licensing laws of every state were examined. Finally, HEW Secretary Elliot Richardson approved the revisions and sent them to the Office of Management of the Budget (OMB), whose approval was necessary before the new standards could be implemented.

Sadly, the 1972 revisions became the victim of the politics of the time. On the one hand, some advocacy groups feared that nothing good could come out of an agency in any way associated with the Nixon administration. These groups claimed that the 1972 revisions diluted the 1968 FIDCR. On the other hand, OMB officials correctly realized that the 1972 revisions would be enforceable and thus would substantially increase the Federal day care bill.

Five years later, we feel that the 1972 proposed standards deserve a new and objective hearing. While no standards can represent a last word on day care, we think the 1972 revisions have several advantages over the 1968 standards which are worthy of consideration. First, the 1972 proposed standards are more appropriate and enforceable than the 1968 FIDCR. Second, the 1972 revisions are less center-based; they reflect the fact that most day care is conducted in homes, not centers. Third, the 1972 revisions are more age-specific, providing for the special needs of infants and toddlers. Fourth, the 1972 standards are much more precise on staff competency and the responsibilities of administering agencies and day care providers to the families they are supposed to be serving. A column-by-column comparison of the two sets of standards reveals some of the major differences, as well as the issues that must be considered in defining any set of standards:

COMPARISON OF FEDERAL

APPROACH 6

PROPOSED 1972 FEDERAL DAY CARE REQUIREMENTS (FDCR)[19]

- Applies to all Federally supported day care.
- Distinguishes among 7 different age groups for day care centers and 3 age groups for day care homes.
- Clearly distinguishes among specific requirements pertaining to caregivers, operators, and administering agencies.
- Distinguishes among three different day care settings:
  - centers
  - family day care homes (including what are generally called group day care homes)
  - in-home care
- Contains realistic requirements for each type of day care arrangement; generally specific and concrete; capable of being enforced.

DAY CARE REQUIREMENTS

SCOPE

1968 FEDERAL INTERAGENCY DAY CARE REQUIREMENTS (FIDCR)[20]

- Applies to all Federally supported day care except in-home care.
- Distinguishes among 3 different age groups for centers and 3 for day care homes.
- No clear and consistent distinctions concerning the respective requirements pertaining to caregivers, operators, and administering agencies.
- Covers only centers and family and group day care homes. Contains no requirements pertaining to in-home care.
- Developed primarily with center care in mind; vague; difficult to enforce; largely ignored in many places.

FDCR '72

- Specifies that only persons who possess required competencies and abilities and who provide direct care to children may be counted as caregivers. Volunteers are encouraged but may not be counted in determining child-staff ratios.

- Ratios for <u>centers</u>:

1 caregiver per	3 infants (0-18 months)
	4 toddlers (19-35 months)
	7 children (36-53 months)
	10 children (54-71 months)
	13 children (6-8 years)
	16 children (9-11 years)
	20 children (12-14 years)

- Includes a simple method for computing required number of caregiver hours when serving mixed age groups and children in combinations of full and part-day care.

- <u>Ratios for family day care homes</u> (including what is sometimes referred to as "group day care homes"):

  One caregiver per 6 children, provided that when 2 children under 3 are present there is at least one caregiver for each 5 children; and when 3 children under 3 are present there is at least one caregiver for each 4 children. In no case may one caregiver care for more than 3 children under 3 or more than 2 infants.

RATIOS

FIDCR '68

- Permits any adult in the facility to be counted in determining child-staff ratios (these may include administrative and clerical personnel, volunteers, aides, as well as housekeeping personnel).

- Ratios for centers:

  1 adult per ( )* children (under 3 years)
  5 children (3-4 years)
  7 children (4-6 years)
  10 children (6-14 years)

  *Sets no required ratio. Specifies that State standards are to be followed. The average ratio of adults to children under three is approximately 1:7 in states where such ratios have been established.

- Does not indicate how to compute staff time required for mixed age groups or children in combinations of full and part-day care.

- Ratios for:

  Family day care homes - one adult per 6 children aged 3-14 years; one adult per 5 children aged 0-6 provided that no more than 2 are under two.

  Group day care homes - one adult per 6 children aged 3-14 years; one adult per 5 preschoolers.

FDCR '72

- Specified ratios for day care homes do not permit one caregiver to serve:
  - 2 infants and 3 toddlers
  - or
  - 2 infants and 2 toddlers
  - or
  - 1 infant and 3 toddlers
  - or
  - 1 infant and 4 toddlers
  - or
  - 4 toddlers
  - or
  - 5 toddlers
- For day care homes a child-to-caregiver ratio of no more than 4:1 is required when one caregiver serves
  - 3 toddlers
  - or
  - 1 infant and 2 toddlers
  - or
  - 2 infants and 1 toddler

(CONTINUED)

FIDCR '68

' Specified ratios for family day care homes do permit one adult to serve the infant and toddler groupings specified opposite.

' For day care homes a child-to-adult ratio of 5:1 is permitted for the infant and toddler groupings specified opposite.

REQUIREMENTS/COMPETENCIES PERTAINING

FDCR '72

- All caregivers are required to possess specified competencies, and must be able to provide children with appropriate developmental activities and experiences according to a written plan or schedule.

- Specifies, generally, what such a written plan or program schedule must include.

- Requires the employment of at least one person with specified educational and/or experience qualifications in each center serving 30 or more children.

- Sets forth specific requirements to ensure the accountability of day care operators
  - in providing programs which meet Federal Requirements
  - for the supervision of staff
  - for keeping financial and other records, etc.

TO CAREGIVERS AND OPERATORS

FIDCR '68

- Contains only a general requirement that "educational opportunities must be provided every child" and that caregivers "must have had training or demonstrated ability in working with children."

- Contains no requirement for a written plan or schedule of daily activities.

- Requires that "educational activities must be under the supervision of a staff member trained or experienced in child growth and development"; minimum training or experience qualifications are not specified.

- Unique and specific requirements for operators not clearly identified. No clear distinctions between requirements pertaining to caregivers, operators and administering agencies.

FDCR '72

- Specifically holds administering agencies accountable for arranging and ensuring that children receive appropriate health, psychological and social services.
- Requires that these services be provided through existing programs and funding sources (day care funds may be used to close service gaps).
- Sets forth specific requirements to ensure that children are in fact receiving needed services.

AND SOCIAL SERVICES

FIDCR '68

- Division of responsibility between operators and administering agencies is unclear. No requirements related to psychological services.

- Similar requirement calling for the provision of services through existing programs.

- Health requirements cover the same general areas but are much less specific.

NUTRITION

FDCR 1972

- Specifies number of meals required in relation to hours in care.

- Recognizes the special needs of infants.

- Includes general requirements pertaining to sanitary practices in food storage, preparation, cleaning of utensils, etc.

FIDCR 1968

Requires only "adequate and nutritious meals, prepared in a safe and sanitary manner".

FDCR 1972

- Covers specific parental vs. caregiver/operator/administering agency responsibilities in several critical areas:
  - admissions procedures
  - health, psychological and social services
  - communication in special circumstances

- Requires both operators and administering agencies to give parents information and opportunity to advise on program policies and goals.

- Requires that for each facility serving 15 or more children there must be a policy advisory council consisting of at least 50% parents; requires administering agencies to have an advisory group which includes parents with children in care.

- Requires that administering agencies evaluate and act upon complaints from policy advisory councils and parents in general.

- Requires that policy advisory councils approve applications for grant funding.

- Specifics concerning parental vs. caregiver/operator/ administering agency roles with respect to individual children are unclear or not alluded to.

- Requires either the operator or administering agency to develop and publish program policies and procedures.

- Requires that whenever an operator or administering agency provides care for 40 or more children there must be policy advisory committee consisting of at least 50% parents or parent representatives.

- Does not speak directly to the responsibility of administering agencies to investigate or act upon parent complaints.

- Requires that policy advisory councils approve applications for grant funding.

FDCR 1972

- Requires that all facilities meet State/local licensure requirements.
- Lists specific requirements pertaining to the safety and sanitation of buildings and premises.
- Contains specific requirements related to transportation safety..

SANITATION

FIDCR 1968

- Requires that all facilities meet State/local licensure requirements.
- Covers some areas related to the suitability of facilities. Requirements are general and vague.
- No requirements pertaining to transportation safety.

It is too simplistic to argue that the 1972 proposed standards are more lenient than the 1968 FIDCR. The revisions would allow one caregiver to care for seven children in the 3 to 4-1/2 year age range, while the 1968 standards would allow no more than a 1:5 ratio for this age group. Experience since 1968 suggests that this is generally possible if the caregiver is not burdened with other responsibilities, and the children have no extraordinary needs. The 1972 revisions are, however, more stringent than the 1968 FIDCR in that they allow one caregiver to care for no more than three infants. How did we decide on this figure, and why did the 1968 drafters not specify any ratio for infant day care?

Infant Day Care Controversy

As early as 1944, a Children's Bureau conference concluded that children under three did not, in general, benefit from group experience. Most child development experts would probably still suggest extreme caution in group care for very young children. Yet, more and more parents are placing children under three in day care; indeed, this sector shows the fastest rise in day care utilization. While we are far from sanguine about this increase, there is no clear evidence that infant day care, of adequate quality, harms children. Outstanding psychologists have concluded that infant day care is not associated with any marked deleterious consequences.[21,22] While other studies (e.g., Blehar;[23] Lippman & Grote;[24] and Schwarz, Strickland, & Krolick[25]) report possible negative effects, they are perhaps too subtle to guide the policymakar. Most important, none of these studies takes into account the real-life alternatives--e.g., the effects of day care vs. the effects of being parked at home in front of the TV all day, or the effects of generously staffed vs. understaffed day care on children. In evaluating the impact of day care, many factors concerning children's lives, not simply short-term programmatic effects, must be considered.[26,27,28]

Based on existing research and our own best judgment, we decided on the 1:3 ratio for infants under 18 months. One has only to think of the burdens of the mother of twins or triplets to wonder how one caregiver could regularly care for four hungry babies or curious toddlers. And what would happen in the event of a fire or other crisis? One caregiver for two children below age two would probably best approximate what most parents want for their children. However, such a ratio would be so prohibitively expensive that it would only discourage compliance. In finally deciding on the ratio of 1:3 for infants, we had to satisfy many interests—those of the mother who needs a place for her infant, the provider who must operate without losing money and perhaps with a profit, and the young child who needs a special kind of caring.

Lessons to Guide Enforcement

In restructuring Federal day care requirements, it is important to remember the practical lessons of day care regulation at the state and local level. Locally, regulation has perhaps done as much to prevent good day care as to exclude bad. Complying with complex fire, building, zoning and other codes which were not specifically designed for day care has often made licensed day care prohibitively expensive in centers and impossible to provide in homes.[29,30] Model state licensing codes, developed by the Office of Child Development, are making inroads against these antiquated procedures.[31] However, action involving so many overlapping state bodies is inevitably slow. Experts in state day care regulation generally hope for licensing procedures that will help day care facilities to comply, not just order them to close, thereby removing the present incentive to go underground.[30]

Several lessons emerge from the state and local experience. First, drafters of any new Federal standards must be careful to analyze the cost

implications of day care dictated by the standards (as was done for the 1972 revision).[32,33] The agency which sets the standards must have some fiscal power to assure that the states get sufficient funds to comply. Second, standards are meaningless without a monitoring system to enforce them. There are several alternatives for such a system. Monitoring could be conducted entirely by the states or through regional offices of HEW. We tend to favor state-level monitoring, with periodic review by regional offices. We also think it is crucial to include a parent component whereby parent users of day care participate in the monitoring process. Finally, as former HEW Secretary Wilbur Cohen suggests, it is unrealistic to expect hundreds of thousands of American day care settings to meet any agreed-upon set of standards overnight. There must be a grace period, up to a year on all but the most serious deficiencies, in which standards are not used to drive day care settings out of existence, but rather to aid them in upgrading their services. When day care does not meet Federal standards, the providers should be given a list of necessary modifications, indicating the priorities and granting a reasonable time frame for implementation.

Most discussions of day care standards include recommendations on who should administer or deliver day care at the state and local level. Some advocates feel that the public school system, with its history of administrative and educational sophistication, could best guarantee the delivery of quality day care under the supervision of local boards of education; others feel that the school system is already overburdened, often educationally unsuccessful, and too insulated from community forces to be entrusted with day care. Some child advocates feel that for-profit day care is incompatible with humane care and high quality and should be excluded from receiving Federal funds; others, that private enterprise is basic to the American system and that

business expertise should be able to deliver economically viable, high quality day care responsive to consumer demands. This very pluralism of day care underscores the importance of Federal standards for quality. Until more definite knowledge is available, the Federal stance should be as neutral as possible on day care delivery, allowing day care to be administered by schools, as well as by community organizations. Similarly, with respect to profit-making day care, the central issue does not seem to be whether for-profit day care should benefit from Federal funds, but rather whether day care, non-profit or for-profit, will comply with quality standards. If realistic Federal day care standards were set and enforced, we think many of the current battles about the appropriate role of the schools and profit-making day care would be resolved satisfactorily.

In conclusion, the safety and welfare of children in day care makes it crucial that our nation commit itself to some Federal standards for the care purchased with Federal money or encouraged by Federal policy. The standards must be realistic, explicit, operationally definable, and enforceable; sensitive to the individual needs of children and families and to differences during development; appropriate for day care provided in different types of settings; and carefully analyzed for cost. Sufficient funding and consultation should be available to assist providers in complying with standards within a defined, finite "grace" period. And the Federal agency which sets the standards should have the real economic power to assure that standards are respected in practice.

Formal evaluations of implemented Federal standards and increasing experience with the impact of day care on children and families will, no doubt, clarify areas in which there has been continuing disagreement--e.g., the role of private enterprise in providing day care or the benefits and

dangers in day care for infants and toddlers. These and other areas of legitimate concern indicate the need for thoughtful, longitudinal studies which are sensitive to the real options that face families. Emerging experience, research, and evaluations will also suggest revisions in standards for day care. However, available knowledge already delineates broad areas of consensus about the basic, minimal characteristics of the care which a nation such as ours should offer its children. During the past decade, discussion among child care advocates has often highlighted differences in emphasis and ideology. The more fundamental, broader areas of agreement have tended to become obscured. Individuals and groups concerned with day care should be cautious that the goal of an ideal child care system available to all children in the future does not lead to inaction on behalf of those children who are in day care today and tomorrow.

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